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## TO THE HONORABLE COURT, THE PARTIES AND THEIR ATTORNEYS **OF RECORD:**

Plaintiffs HIDDEN EMPIRE HOLDINGS, LLC, HYPER ENGINE, LLC, and DEON TAYLOR, (collectively, "Plaintiffs"), Third-Party Defendant Roxanne Taylor ("Roxanne"), and Defendants DARRICK ANGELONE, AONE CREATIVE, LLC, and ON CHAIN INNOVATIONS, LLC (collectively, "Defendants") hereby submit this Joint Report pursuant to the Court's Order dated May 27, 2025 (hereinafter, the "Order".)

Per the Order, the Parties have met and conferred regarding the remaining third-party subpoenas in the "Talent" category, excluding Robert Smith and any third parties who were involved in the "Fear" motion picture and/or video game. Upon conferring, the Parties do not agree about the remaining third-parties in the Talent category: (1) Eric M. Bishop, (2) Dr. Henry Louis Gates, (3) Percy Miller, (4) Roland Martin, and (5) Van Jones.

Pursuant to the Order, the following table represents the Defendants' proposed 16 document requests to these remaining third parties, and Plaintiffs' objections thereto:

Name	<b>Documents Sought</b>	Plaintiffs' Objections
Eric M. Bishop	partial or full—that identifies Darrick Angelone and/or AONE Entertainment LLC and their role in Hyper Engine;  (b) All communications with Hidden Empire, Hyper Engine, Deon Taylor, Roxanne Taylor, Darrick Angelone, AONE, AONE Creative, LLC, or AONE Entertainment, LLC regarding any Hyper Engine films or projects on	<ul> <li>(a) Mr. Bishop merely participated in an event promoted by Hyper Engine – he had no contractual relationship with Hyper Engine.</li> <li>(b) This request is overbroad and is not limited to the issues in this case; Hyper Engine did not produce any films; Mr. Bishop had no contractual agreement with Hyper Engine.</li> </ul>

Name	<b>Documents Sought</b>	Plaintiffs' Objections
	(c) All communications with Hidden Empire, Hyper Engine, Deon Taylor, Roxanne Taylor, Darrick Angelone, AONE, AONE	(c) Mr. Angelone's work or role in films or projects of Hidden Empire Film Group is not relevant to this
	Creative, LLC, or AONE Entertainment, LLC regarding Darrick Angelone's work or role in films or projects of Hidden Empire	dispute; this request is over broad.
	Film Group	
	(-) A 1 - C C 1	
	(a) Any contract—draft or final, partial or full—that identifies	<ul> <li>(a) Mr. Angelone has not indicated any basis for belief that Professor Gates would have a contract that refers to him, AOne, or their role in Hyper Engine.</li> <li>(b) This request is overbroad and is not limited to the issues in this case; Hyper Engine did not</li> </ul>
	Darrick Angelone and/or AONE Entertainment LLC and their role in	
	Hyper Engine;	
	(b) All communications with	
Dr. Henry Louis	Hidden Empire, Hyper Engine, Deon Taylor, Roxanne Taylor, Darrick Angelone, AONE, AONE Creative, LLC, or AONE Entertainment, LLC regarding any	
Gates		
	(c) All Documents sufficient to show ownership of the series known as "Black History in Two Minutes"	
	(a) All documents and	(a) This request is
Percy Miller	communications with Hidden Empire, Hyper Engine, Deon Taylor, Roxanne Taylor, Darrick	overbroad and is not limited to the issues in this case in that it seeks all
		communications regarding the film.

Name	<b>Documents Sought</b>	Plaintiffs' Objections
	regarding the Untitled Scripted Series about Percy Miller (AKA "Master P");	
	(b) All Documents and Communications regarding business disruptions or delays to HEFG	
	allegedly caused by Darrick Angelone or AONE	
		(a) Mr. Martin merely
		participated in appearances promoted by Hyper Engine
		he had no contractual relationship with Hyper
		Engine.
		(b) This request is
		overbroad and is not limited
Roland Martin	Same as Eric. M. Bishop, above	to the issues in this case; Hyper Engine did not
Kolana Wartin		produce any films; Mr. Martin had no contractual
		agreement with Hyper
		Engine.
		(c) Mr. Angelone's work or role in films or projects of
		Hidden Empire Film Group
		is not relevant to this dispute; this request is over
		broad.
Van Jones		(a) Mr. Jones merely participated in events
	Company E. S. M. D. 1	promoted by Hyper Engine
	Same as Eric M. Bishop, above	<ul><li>he had no contractual relationship with Hyper</li></ul>
		Engine.

Name	<b>Documents Sought</b>	Plaintiffs' Objections
		(b) This request is
		overbroad and is not limite
		to the issues in this case; Hyper Engine did not
		produce any films; Mr.
		Jones had no contractual
		agreement with Hyper
		Engine.
		(c) Mr. Angelone's work of
		role in films or projects of
		Hidden Empire Film Group
		is not relevant to this dispute; this request is over
		broad.
		'
Dated: June 9, 2025		OFFICES OF JT FOX
	ASSO	CIATES, APC
	By:	/s/JT Fox J.T. Fox, Esq.
	Ву:	/s/ JT Fox
	By:	/s/JT Fox J.T. Fox, Esq.
	By: Attorn Angelo	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick
Dated: June 9, 202:	By: Attorn Angelo On Ch	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and
Dated: June 9, 202:	By: Attorn Angelo On Ch	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC
Dated: June 9, 202:	By: Attorm Angelo On Ch	/s/JT Fox J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC MER, DEBOER & KEANE
Dated: June 9, 202:	By: Attorn Angelo On Ch  KRAN	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC
Dated: June 9, 2025	By: Attorm Angelo On Ch  KRAM	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC  MER, DEBOER & KEANE  /s/ Sandra Calin Sandra Calin, Esq
Dated: June 9, 202:	By: Attorm Angelo On Ch  KRAM  By:	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC  MER, DEBOER & KEANE  /s/ Sandra Calin Sandra Calin, Esq eys for Defendants Darrick
Dated: June 9, 202:	By: Attorm Angelo On Ch  KRAM  By: Attorm Angelo	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC  MER, DEBOER & KEANE  /s/ Sandra Calin Sandra Calin, Esq
Dated: June 9, 2025	By: Attorm Angelo On Ch  KRAM  By: Attorm Angelo	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC  MER, DEBOER & KEANE  /s/ Sandra Calin Sandra Calin, Esq  eys for Defendants Darrick one, AONE Creative, LLC, and
Dated: June 9, 2025	By: Attorm Angelo On Ch  KRAM  By: Attorm Angelo	/s/JT Fox  J.T. Fox, Esq.  eys for Defendants, Darrick one, AONE Creative, LLC, and ain Innovations, LLC  MER, DEBOER & KEANE  /s/ Sandra Calin Sandra Calin, Esq  eys for Defendants Darrick one, AONE Creative, LLC, and

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1	Dated: June 9, 2025		NEWELL LAV	W GROUP PC	
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3					
4		By: <u>/s/Felton T. Newell</u>			
5			Felton T.	Newell, Esq	
6			Attorneys for H	idden Empire Holdings,	
7				gine, LLC, Deon	
8			Taylor, And Ro	xanne Taylor	
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	JOINT REPORT REGARDING INFORMAL DISCOVERY CONFERENCE				